
Request for Short-Term Confidentiality

November 7, 2013
ITP-13-F006A

Federal Communications Commission
Authorization and Standards Division
7435 Oakland Mills Road

Re: Original Application TD-CDMA PCI Express Mini Module for Limited Modular Approval
Panasonic TD-CDMA PCI Express Mini Module, Model WW11A / FCC ID: ACJ9TGWW11A
Installation within Panasonic Personal Computer Model FZ-G1

To Whom It May Concern:

Pursuant to the provisions of Sections 0.457 and 0.459 of the Commission's rules (47 CFR §§ 0.457, 0.459), we are requesting the Commission to withhold the following attachments as confidential document from public disclosure indefinitely.

- Schematic Diagram
- Block Diagram
- Theory of Operation (Operational Description)
- Tune-up Procedure

Above mentioned document contains detailed system and equipment description are considered as proprietary information in operation of the equipment. The public disclosure of above documents might be harmful to our company and would give competitor an unfair advantage in the market.

It is our understanding that all measurement test reports, FCC ID label format and correspondent during certification review process cannot be granted as confidential documents and those information will be available for public review once the grant of equipment authorization is issued.

In addition, please be advised that Panasonic Corporation of North America hereby requests the following filed sensitive information to be held under short-term confidential, pursuant to the provisions of Sections 0.457 and 0.459 of the Commission's Rules and the provisions in FCC Public DA 04-1705. We request temporarily confidentiality of forty-five days, starting from the original issued Certification grant date.

- Operating Instructions (Users Manual for Host and Module)
- Test Setup Photographs
- External & Internal Photographs

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Panasonic also acknowledges that we will provide appropriate notice to PCTEST Engineering Laboratory Inc should either of the following occur:

- If we require additional 45 day extension period, we will notify PCTEST Engineering Laboratory Inc with a new request letter at least seven days prior to the short-term confidentiality expiration date [Note: up to a maximum of 3 extensions only are allowed], or
- We will immediately notify PCTEST Engineering Laboratory Inc in the event the information regarding the product or the product is made available to the public. PCTEST Engineering Laboratory Inc will then release the documents listed above for public disclosure, pursuant to FCC Public Notice DA 04-1705.

Sincerely yours,

Ben Botros

Ben Botros
Project Manager
Product Safety & Compliance Division

Applicant/Grantee		Panasonic Corporation of North America	
FCC ID:		ACJ9TGWW11A	
Section 15.212 Modular Transmitters			
Request for Modular Approval		<input type="checkbox"/>	Request for Limited Modular Approval <input checked="" type="checkbox"/>
	Requirements	EUT Conditions	Comply (Y/N)
Single Modular Approval Requirements			
1	The radio elements of the modular transmitter must have their own shielding. The physical crystal and tuning capacitors may be located external to the shielded radio elements.	The module has its own shielding and does not rely upon any shielding that maybe introduced as a result of integrating the module into a final product.	Y
2	The modular transmitter must have buffered modulation/data inputs (if such inputs are provided) to ensure that the module will comply with Part 15 requirements under conditions of excessive data rates or over-modulation.	The module provides a USB interface, this interface is digital and therefore does not allow excessive data rates or over-modulation to occur.	Y
3	The modular transmitter must have its own power supply regulation.	The module has on-board power conversion from the primary supply and is therefore not reliant on any power conversion from the host equipment.	Y
4	The modular transmitter must comply with the antenna and transmission system requirements of Sections 15.203, 15.204(b) and 15.204(c). The antenna must either be permanently attached or employ a “unique” antenna coupler (at all connections between the module and the antenna, including the cable). The “professional installation” provision of Section 15.203 is not applicable to modules but can apply to limited modular approvals under paragraph (b) of this section.	The module is not supplied with antennae and the antennae connectors provided on the pcb are considered unique connectors.	Y
5	The modular transmitter must be tested in a stand-alone configuration, <i>i.e.</i> , the module must not be inside another device during testing for compliance with Part 15 requirements. Unless the transmitter module will be battery powered, it must comply with the AC line conducted requirements found in Section 15.207. AC or DC power lines and data input/output lines connected to the module must not contain ferrites, unless they will be marketed with the module (see Section 15.27(a)). The length of these lines shall be the length typical of actual use or, if that length is unknown, at least 10 centimeters to insure that there is no coupling between the case of the module and supporting equipment. Any accessories, peripherals, or support equipment connected to the module during testing shall be unmodified and commercially available (see Section 15.31(i)).	The module has been tested with installed in Panasonic Personal Computer Model FZ-G1	N
6	The modular transmitter must be equipped with either a permanently affixed label or must be capable of electronically displaying its FCC identification number.	The proposed FCC ID label format is to be placed on the module. If FCC ID is not visible when the module is installed into the system,	Y

	<p>(A) <i>If using a permanently affixed label, the modular transmitter must be labeled with its own FCC identification number, and, if the FCC identification number is not visible when the module is installed inside another device, then the outside of the device into which the module is installed must also display a label referring to the enclosed module. This exterior label can use wording such as the following: “Contains Transmitter Module FCC ID: XYZMODEL1” or “Contains FCC ID: XYZMODEL1.” Any similar wording that expresses the same meaning may be used. The Grantee may either provide such a label, an example of which must be included in the application for equipment authorization, or, must provide adequate instructions along with the module which explain this requirement. In the latter case, a copy of these instructions must be included in the application for equipment authorization.</i></p> <p>(B) <i>If the modular transmitter uses an electronic display of the FCC identification number, the information must be readily accessible and visible on the modular transmitter or on the device in which it is installed. If the module is installed inside another device, then the outside of the device into which the module is installed must display a label referring to the enclosed module. This exterior label can use wording such as the following: “Contains FCC certified transmitter module(s).” Any similar wording that expresses the same meaning may be used. The user manual must include instructions on how to access the electronic display. A copy of these instructions must be included in the application for equipment authorization.</i></p>	<p>“Contains FCC ID: ACJ9TGWW11A” shall be placed on the outside of final host system.</p>	
7	<p>The modular transmitter must comply with any specific rules or operating requirements that ordinarily apply to a complete transmitter and the manufacturer must provide adequate instructions along with the module to explain any such requirements. A copy of these instructions must be included in the application for equipment authorization.</p>	<p>The integration instructions have been provided with this application.</p>	Y
8	<p>The modular transmitter must comply with any applicable RF exposure requirements in its final configuration.</p>	<p>The device complies with RF exposure compliance requirement.</p>	Y
<p>A limited modular approval may be granted for single or split modular transmitters that do not comply with all of the above requirements, <i>e.g.</i>, shielding, minimum signaling amplitude, buffered modulation/data inputs, or power supply regulation, if the manufacturer can demonstrate by alternative means in the application for equipment authorization that the modular transmitter meets all the applicable Part 15 requirements under the operating conditions in which the transmitter will be used. Limited modular approval also may be granted in those instances where compliance with RF exposure rules is demonstrated only for particular product configurations. The applicant for certification must state how control of the end product into which the module will be installed will be maintained such that full compliance of the end product is always ensured.</p>			